

FACT SHEET

as required by LAC 33:IX.3109 for major LPDES facilities, for draft Louisiana Pollutant Discharge Elimination System Permit No. LA0036382; AI 4856; PER20080001 to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. THE APPLICANT IS:

Lafayette Consolidated Government
East Wastewater Treatment Plant
P.O. Box 4017-C
Lafayette, LA 70502

II. PREPARED BY:

Afton J. Bessix

DATE PREPARED:

January 7, 2009

III. PERMIT ACTION:

Reissue LPDES permit LA0036382, AI 4856

LPDES application received: April 30, 2008

EPA has not retained enforcement authority.

LPDES permit issued: September 30, 2003

LPDES permit expired: September 29, 2008

IV.

FACILITY INFORMATION:

A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the City of Lafayette.

B. The permit application indicates the receipt of industrial wastewater. The industrial dischargers include:

<u>Name of Discharger</u>	<u>Flow</u>
Allied Waste Services	867.8 GPD
PHI Inc.	4,233.8 GPD

C. The facility is located at 144 Judy Street in Lafayette, Lafayette Parish.

D. The treatment facility consists of a mechanical screening and grit removal, followed by primary sedimentation, mechanically aerated oxidation ditches; thence secondary clarification. Sludge is anaerobically digested and then mechanically and chemically dewatered before final application to permitted sites. Disinfection is by chlorination.

Fact Sheet

LA0036382; A14856; PER20080001

Page 2

E. Outfall 001

Discharge Location: Latitude 30° 12' 54" North
Longitude 91° 59' 54" West

Description: treated sanitary wastewater

Design Capacity: 4.0 MGD

Type of Flow Measurement which the facility is currently using:

Combination Totalizing Meter / Continuous Recorder

V. RECEIVING WATERS:

The discharge is into the Vermilion River in segment 060801 of the Vermilion - Teche Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The critical low flow (7Q10) of the Vermilion River is 255 cfs.

The hardness value is 67.0 mg/l and the fifteenth percentile value for TSS is 21 mg/l.

The designated uses and degree of support for Segment 060801 of the Vermilion - Teche Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment	Degree of Support for Each Use						
Partial	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Not Supported	Not Supported	Not Supported	N/A	N/A	N/A	Full

^{1/} The designated uses and degree of support for Segment 060801 of the Vermilion - Teche Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 060801 of the Vermilion - Teche Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007, from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. It was

Fact Sheet

LA0036382; A14856; PER20080001

Page 3

determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

VII.

HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII.

PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit to the LDEQ contact person, listed below, and may request a public hearing to clarify issues involved in the permit decision. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

For additional information, contact:

Ms. Afton J. Bessix
Permits Division
Department of Environmental Quality
Office of Environmental Services
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX.

PROPOSED PERMIT LIMITS:

Subsegment 060801, Vermilion River Headwaters to Bayou Fusilier-Bourbeaux junction to New Flanders (Ambassador Caffery) Bridge, LA Hwy. 3073, is not listed on LDEQ's Final 2006 303(d) List as impaired. However, subsegment 060801 was previously listed as impaired for phosphorus, nitrogen, organic enrichment/low DO, pathogen indicators, suspended solids/turbidity/siltation, and carbofuran, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 060801:

1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen

This TMDL was finalized January 19, 2001 and established a loading capacity equal to the 1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen. This TMDL estimated the necessary reduction in nonpoint source loadings to accelerate progress toward full support of the DO standard. Since the TMDL did not require reductions in point

Fact Sheet

LA0036382; AI4856; PER20080001

Page 4

source loadings, no additional permit requirements are included. However, individual point sources in the Vermilion Watershed should continue to be issued on the basis of flow rates as follows:

FLOW RATE

greater than 25,000 gpd

PERMIT LIMITSMay - Dec.: 10 mg/l CBOD₅/5 mg/l NH₃-N/5 mg/l DOJan.- April: 20 mg/l CBOD₅/10 mg/l NH₃-N/5 mg/l DO

25,000 gpd or less

secondary limits year round

Additionally, in regard to nutrients such as nitrogen and phosphorous, LDEQ has determined that organic enrichment/DO directly correlates with overall nutrient impact. Thus, when organic enrichment/DO is limited (as with the established CBOD₅/NH₃-N/DO limits), LDEQ is also in effect limiting and controlling nutrient concentrations and impacts.

Therefore, this discharge will be permitted accordingly, and the permit maintains previously established limitations reflecting the above limits.

TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin

As per the TMDL finalized May 3, 2001, "Point sources do not represent a significant source of TSS as defined in this TMDL. Point sources discharge primarily organic TSS, which does not contribute to habitat impairment resulting from sedimentation. Because the point sources are minor contributors and discharges of organic suspended solids from point sources are already addressed by LDEQ through their permitting of point sources to maintain water quality standards for DO, the wasteload allocations for point source contributions were set to zero."

Therefore, TSS limits are being maintained as previously established in this permit according to the current state water quality standards.

Vermilion River TMDL for Fecal Coliform

The Vermilion River TMDL for Fecal Coliform was finalized on April 5, 2001, addressing the presence of pathogen indicators in the watershed. As per this TMDL, "...there will be no change in the permit requirements based upon a wasteload allocation resulting from this TMDL." Therefore, Fecal Coliform effluent limitations will remain as previously established in this permit.

TMDL for the Pesticide Carbofuran in the Mermentau River and Vermilion-Teche River Basins

The TMDL for the Pesticide Carbofuran in the Mermentau River and Vermilion-Teche River Basins was finalized on March 21, 2002 and states that "the one point source discharger, FMC Corporation's Agricultural Products Group Plant (FMC)... is the only known point source in the Vermilion-Teche Basin." As a result, the TMDL establishes a WLA for FMC only. Since this TMDL does not consider the Lafayette East Plant to be a contributing source, no additional permit requirements are included.

Vermilion River TMDL for Sulfate

This TMDL was originally finalized on March 13, 2001 and established a specific WLA for the Lafayette East Plant. Due to a subsequent change in criterion, this TMDL was withdrawn on June 28, 2005. Therefore, no additional permit limitations are required.

Fact Sheet

LA0036382; A14856; PER20080001

Page 5

Final Effluent Limits:

OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
CBOD ₅ May – Dec.	334	10 mg/l	15 mg/l	Limits are set in accordance with the 1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Oxygen.
Jan. – April	667	20 mg/l	30 mg/l	
TSS May – Dec.	500	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.
Jan. – April	667	20 mg/l	30 mg/l	
Ammonia-Nitrogen May – Dec.	167	5 mg/l	10 mg/l	Limits are set in accordance with the 1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Oxygen.
Jan. – April	334	10 mg/l	20 mg/l	
Dissolved Oxygen	---	5 mg/l	N/A	Limits are set in accordance with the 1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Oxygen.

**This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.

Fact Sheet

LA0036382; AI4856; PER20080001

Page 6

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. Limits are set in accordance with *Vermilion River TMDL for Fecal Coliform*.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

4) Total Residual Chlorine

If chlorination is used to achieve the limitations on Fecal Coliform Bacteria, the effluent shall contain NO MEASURABLE Total Residual Chlorine (TRC) after disinfection and prior to disposal. Given the current constraints pertaining to chlorine analytical methods, NO MEASURABLE will be defined as less than 0.1 mg/l of chlorine. The TRC shall be monitored 5/week by grab sample. Limit set through BPJ in accordance with the previous LPDES permit.

Toxicity Characteristics

In accordance with EPA's Region 6 Post-Third Round Toxics Strategy, permits issued to treatment works treating domestic wastewater with a flow (design or expected) greater than or equal to 1 MGD shall require biomonitoring at some frequency for the life of the permit or where available data show reasonable potential to cause lethal and/or sub-lethal toxicity, the permit shall require a whole effluent toxicity (WET) limit (*Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards*, April 16, 2008, VERSION 6).

Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential toxicity. LAC 33:IX.1121.B.3. provides for the use of biomonitoring to monitor the effluent for protection of State waters. The biomonitoring procedures stipulated as a condition of this permit are as follows:

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No. LA0036382, Biomonitoring Section for the organisms indicated below.

Fact Sheet

LA0036382; A14856; PER20080001

Page 7

TOXICITY TESTS

FREQUENCY

Chronic static renewal 7-day survival & reproduction test
using Ceriodaphnia dubia

once/quarter¹

Chronic static renewal 7-day survival & growth test
using fathead minnow (Pimephales promelas)

once/quarter¹

¹ If there are no lethal or sub-lethal effects demonstrated after the first year of quarterly testing, the permittee may certify fulfillment of the WET testing requirements in writing to the permitting authority. If granted, the biomonitoring frequency for the test species may be reduced to not less than once per year for the less sensitive species (usually Pimephales promelas) and not less than twice per year for the more sensitive species (usually Ceriodaphnia dubia). Upon expiration of the permit, the biomonitoring frequency for both species shall revert to once per quarter until the permit is re-issued.

Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 8%, 6%, 4%, 3%, and 2%. The low-flow effluent concentration (critical low-flow dilution) is defined as 6% effluent. The critical dilution is calculated in Appendix B-1 of this fact sheet. Please see the attached biomonitoring frequency recommendation and rationale for additional requirements. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the Biomonitoring Section under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the Biomonitoring Section of the permit.

The permit may be reopened to require effluent limits, additional testing, and/or other appropriate actions to address toxicity if biomonitoring data show actual or potential ambient toxicity to be the result of the permittee's discharge to the receiving stream or water body. Modification or revocation of the permit is subject to the provisions of LAC 33:IX.2903. Accelerated or intensified toxicity testing may be required in accordance with Section 308 of the Clean Water Act.

X.

PREVIOUS PERMITS:

LPDES Permit No. WP:

Issued: November 1, 2003

Expired: October 31, 2008

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Monthly Avg.</u>	<u>Weekly Avg.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
CBOD ₅				
May - December	10 mg/l	15 mg/l	2/week	6 Hr. Composite
January - April	20 mg/l	30 mg/l	2/week	6 Hr. Composite
TSS				
May - December	15 mg/l	23 mg/l	2/week	6 Hr. Composite
January - April	20 mg/l	30 mg/l	2/week	6 Hr. Composite
Ammonia-Nitrogen				
May - December	5 mg/l	10 mg/l	2/week	6 Hr. Composite
January - April	10 mg/l	20 mg/l	2/week	6 Hr. Composite

Fact Sheet

LA0036382; A14856; PER20080001

Page 8

<u>Effluent Characteristic</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Monthly Avg.</u>	<u>Weekly Avg.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Dissolved Oxygen	5 mg/l minimum	---	2/week	Grab
Total Residual Chlorine (TRC)	---	---	2/week	Grab
Fecal Coliform	---	---	2/week	Grab
Colonies/100 ml	---	---	2/week	Grab
pH (Standard Units)	---	---	2/week	Grab
Whole Effluent Lethality				
<u>Ceriodapnia dubia</u>	Report	Report	1/quarter	24-Hr Composite
<u>Pimephales promelas</u>	Report	Report	1/quarter	24-Hr Composite

The permit contains biomonitoring.

XI.

ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates that an inspection was performed on March 17, 2008 for this facility.

Inspector - LDEQ

Findings and/or Violations -

1. Mr. Danny Derousselle provided lab analysis data and DMRs at the time of the inspection.
2. The data on the lab analysis sheets was consistent with the DMRs.
3. All paperwork including calibration logs were found to be in order.
4. All needed treatment units were in service at the time of the inspection.
5. Hydraulic overloads do occur at the treatment plant due to I & I problems in the collection system, but permit excursions do not occur as a result.
6. A 300-gallon spill did occur at the plant on December 7, 2006 that was contained on the plant grounds and did not reach waters of the state.
7. The area was cleaned up and the incident was recorded in the storm water log book.
8. A total of 5 collection system overflows occurred from January - October 2006.
9. Samples are being taken at appropriate times and at the specified location.
10. The flow is being continuously recorded as required by the permit and the flow calculation check revealed an error of -1.5%.
11. Facility personnel do conduct routine checks on the flow meter to assure continued compliance.
12. A visual observation of the outfall at the time of the inspection revealed a clear discharge with no foam or visible solids.
13. At the time of the inspection, the facility appeared to be in compliance with the LPDES Permit.

Fact Sheet

LA0036382; A14856; PER20080001

Page 9

B) Compliance and/or Administrative Orders

A review of the files indicates that there are no recent enforcement actions administered against this facility.

C) DMR Review

A review of the discharge monitoring reports for the period beginning May 2006 through June 2008 has revealed the following violations:

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
pH	001	December 2006	6.0 SU minimum	5.9 SU
pH	001	January 2008	6.0 SU minimum	5.9 SU

Additionally, the Biomonitoring Toxicity Testing reports for May 2007 through July 2007 revealed a few issues. The first test for the *Pimephales promelas* had two cups of the 20% and 100% dilutions dropped and a retest was necessary. The reported values were from consolidating the results together for the original test and the retest. The *Ceriodaphnia dubia* report stated that a sub-lethal effect was noted though the report further stated: "Based on Fisher's Exact Test, the survival NOEC of the Lafayette Utilities System East WWTP Outfall 001 effluent was 100%. Using the full data set, Steel's Many-One Rank Test indicated that reproduction in the 5, 9 and 20 % effluent concentrations was significantly less than the control; however, reproduction in the 3, 4, 7, 50 and 100 % effluent concentrations was not significantly less than the control. Because the 20, 50 and 100% concentrations were tested in addition to the required five lowest concentrations, only the data from the five lowest concentrations were evaluated for compliance purposes. Based on Steel's Many-one Rank Test the reproduction NOEC of the Lafayette Utilities System East WWTP Outfall 001 effluent was 4%.

During this cycle of testing, numerous problems were noted on all of Lafayette Utilities System plants, especially, invalid tests and abnormal toxicity dose responses. The contract laboratory's corrective action response was to retrain all of the personnel.

XII. ADDITIONAL INFORMATION:

The Louisiana Department of Environmental Quality (LDEQ) reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDLs. The LDEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Fact Sheet

LA0036382; A14856; PER20080001

Page 10

In accordance with LAC 33:IX.2903., this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b) (2) Cc and CD); 304(b) (2); and 307(a) (2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
2. Controls any pollutant not limited in the permit; or
3. Require reassessment due to change in 303(d) status of waterbody; or
4. Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 4.0 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD: } 8.34 \text{ gal/lb} \times 4.0 \text{ MGD} \times 10 \text{ mg/l} = 334 \text{ lbs/day}$$

At present, the Monitoring Requirements, Sample Types, and Frequency of Sampling as shown in the permit are standard for facilities of flows between 5 and 10 MGD.

Effluent CharacteristicsMonitoring Requirements

	<u>Measurement</u>	<u>Sample</u>
	<u>Frequency</u>	<u>Type</u>
Flow	Continuous	Recorder
CBOD ₅	2/week	6 Hr. Composite
Total Suspended Solids	2/week	6 Hr. Composite
Ammonia-Nitrogen	2/week	6 Hr. Composite
Dissolved Oxygen	2/week	Grab
Fecal Coliform Bacteria	2/week	Grab
Total Residual Chlorine	2/week	Grab
pH	2/week	Grab
Biomonitoring		
<i>Ceriodaphnia dubia</i> (Method 1002.0)	1/quarter	24 Hr. Composite
<i>Pimephales promelas</i> (Method 1000.0)	1/quarter	24 Hr. Composite

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, the City of Lafayette's Pretreatment Program was approved on March 16, 1984, tracked under the Lafayette Consolidated Government – East WWTP LPDES Permit LA0036382. The program was modified on September 24, 1993 to incorporate TBLLs and March 22, 2004 to include major ordinance revisions and pretreatment procedures manual revisions. Because this facility has an approved pretreatment program, it is recommended that LDEQ Option 2A Pretreatment language continue to be included in LPDES Permit LA0036382.

Fact Sheet

LA0036382; A14856; PER20080001

Page 11

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

XIII

TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV

REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations, Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Lafayette Consolidated Government, East Wastewater Treatment Plant, April 30, 2008.